

1 DORSEY & WHITNEY LLP
2 J. Michael Keyes (SBN 262281)
3 *keyes.mike@dorsey.com*
4 Connor J. Hansen (*pro hac vice forthcoming*)
5 *hansen.connor@dorsey.com*
6 Dylan J. Harlow (*pro hac vice forthcoming*)
7 *harlow.dylan@dorsey.com*
8 701 Fifth Avenue, Suite 6100
9 Seattle, WA 98104
10 Telephone: 206.903.8800
11 Facsimile: 206.903.8820

7 DORSEY & WHITNEY LLP
Kent J. Schmidt (SBN 195969)
8 *schmidt.kent@dorsey.com*
9 600 Anton Boulevard, Suite 200
Costa Mesa, CA 92626
Telephone: 714.800.1400
10 Facsimile: 714.800.1499

11 | Attorneys for Defendant TikTok, Inc.

**UNITED STATES DISTRICT COURT
CENTRAL DISTRICT OF CALIFORNIA**

MICHAEL GRECCO PRODUCTIONS, INC.,

17 | Plaintiff,

19 | V.

10 | TIKTOK, INC.,

Defendant.

Case No. 2:24-CV-04837-FLA-MAR

**STIPULATION TO EXTEND TIME
TO RESPOND TO INITIAL
COMPLAINT BY NOT MORE
THAN 30 DAYS (L.R. 8-3)**

Complaint Served: June 14, 2024

Current Response Date: July 5, 2024

New Response Date: August 5, 2024

Plaintiff Michael Grecco Productions, Inc. (“Plaintiff”) and Defendant TikTok, Inc. (“Defendant”) stipulate and respectfully request that the Court extend the deadline for Defendant to answer or otherwise respond to the Complaint by thirty days pursuant to Local Rule 8-3.

WHEREAS, on June 7, 2024, Plaintiff filed a Complaint in this action against Defendant (ECF No. 1);

1 WHEREAS, according to the Proof of Service filed in this action (ECF No.11),
2 Plaintiff served Defendant on June 14, 2024, making Defendant's answer or response
3 to the Complaint due on July 5, 2024;

4 WHEREAS, Defendant recently engaged counsel for this action, who is
5 investigating the merits of this action and getting up to speed;

6 WHEREAS, Plaintiff and Defendant agree to a thirty (30) day extension of
7 time to Defendant's deadline to answer or respond to the Complaint pursuant to Local
8 Rule 8-3;

9 WHEREAS, thirty (30) days from July 5, 2024 falls on August 4, 2024, a
10 Sunday, making Defendant's answer or response to the Complaint due on Monday
11 August 5, 2024;

12 WHEREAS, the parties have not previously requested an extension;

13 THEREFORE, Plaintiff and Defendant stipulate to a thirty (30) day extension
14 of time, making Defendant's answer or response to the Complaint due on August 5,
15 2024.

16 It is so stipulated.

17 ////

18 ////

19 ////

20 ////

21 ////

22 ////

23 ////

24 ////

25 ////

26 ////

27 ////

28 ////

1 Dated: July 2, 2024

DORSEY & WHITNEY LLP

2
3 By: /s/ J. Michael Keyes
J. Michael Keyes (SBN 262281)
keyes.mike@dorsey.com
4 Connor J. Hansen (*pro hac vice*)
hansen.connor@dorsey.com
5 Dylan J. Harlow (*pro hac vice*)
harlow.dyaln@dorsey.com
6 Columbia Center
701 Fifth Avenue, Suite 6100
7 Seattle, WA
8 Telephone: 206.903.8800
Facsimile: 206.903.8820

9
10 DORSEY & WHITNEY LLP
11 Kent J. Schmidt (SBN 195969)
schmidt.kent@dorsey.com
12 600 Anton Boulevard, Suite 200
Costa Mesa, CA 92626
Telephone: 714.800.1400
Facsimile: 714.800.1499

13 *Attorneys for Defendant TikTok, Inc.*

14
15 Dated: July 2, 2024

COPYCAT LEGAL PLLC

16
17 By: /s/ Lauren M. Hausman
Lauren M. Hausman (SBN 349514)
18 113 N. San Vicente Blvd
Suite 232
19 Beverly Hills, CA 90211
(877) 437-6228
lauren@copycatlegal.com

20 *Attorney for Plaintiff Michael Grecco
21 Productions, Inc.*

22
23 Pursuant to Local Rule 5-4.3.4(a)(2)(i), the filing party hereby attests that all
24 signatories listed, and on whose behalf the filing is submitted, concur in the filing's
25 content and have authorized this filing.
26
27
28

CERTIFICATE OF SERVICE

I hereby certify that on July 2, 2024, a true and correct copy of the foregoing was filed electronically using the Court's CM/ECF system, which shall send notification of such filing to all counsel of record. Any counsel of record who has not consented to electronic service through the Court's CM/ECF system will be served by electronic mail.

/s/ J. Michael Keyes
J. Michael Keyes, SBN 262281